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August 27, 2024

The Honorable Stephanos Bibas  
United States District Court  
for the District of Delaware  
844 North King Street  
Wilmington, DE 19801-3570

*VIA ELECTRONIC FILING*

Re: *Thomson Reuters Enterprise Centre GmbH, et al. v. ROSS Intelligence Inc.,*  
C.A. No. 20-613 (SB) (D. Del.)

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Dear Judge Bibas,

I write on behalf of Thomson Reuters about the upcoming antitrust summary judgment argument, scheduled for September 18 (D.I. 616). During the August 6 pretrial conference on the copyright case, the Court raised the issue of oral argument on the pending antitrust motions. Neither side's antitrust counsel was present, and the Court paused the discussion.

There are currently pending five antitrust motions for summary judgment and two antitrust *Daubert* motions.

- TR's Motion for Summary Judgment on ROSS's Antitrust Counterclaims (No. 1) – Separate Products (D.I. 519);
- TR's Motion for Summary Judgment on ROSS's Antitrust Counterclaims (No. 2) – Market Definition and Power (D.I. 521);
- TR's Motion for Summary Judgment on ROSS's Antitrust Counterclaims (No. 3) – Statute of Limitations (D.I. 523);
- TR's Motion for Summary Judgment on ROSS's Antitrust Counterclaims (No. 4) – Injunctive Relief (D.I. 525);
- TR's Motion to Preclude Dr. Alan Cox and Motion for Summary Judgment on ROSS's Antitrust Counterclaims (No. 5) – Comcast (D.I. 527);
- TR's Motion to Exclude Dr. James Ratliff and Dr. Gillian Hadfield (No. 6) (D.I. 529); and
- ROSS's Motion to Exclude Certain Opinions of Plaintiffs and Counter Defendants' Expert Chad Syverson (D.I. 516).

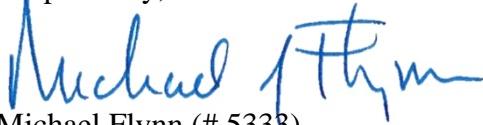
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Thomson Reuters will be prepared to address all pending antitrust motions and any related issues. However, given the breadth of those motions, and the limited time for oral argument, Thomson Reuters wishes to ensure sufficient attention is given to any specific motions or issues the Court is most interested in discussing, and would welcome guidance from the Court on whether the parties should focus their presentations in any way.

Further, Thomson Reuters is available for a longer, in-person hearing if that would be helpful to the Court as it addresses the pending antitrust motions.

Respectfully,

  
Michael Flynn (# 5338)  
*Counsel for Thomson Reuters*

cc: All Counsel of Record